

54020-111887 L013 Contamination Report Site Suitability (Rev 0)

27 October 2017

Sean Porter Lend Lease Pty Ltd Via email: sean.porter@lendlease.com

Contamination Report Site Suitability - Proposed Rezoning, Central Precinct, Llandilo, NSW

Dear Sean,

1. Introduction and Background

JBS&G Australia Pty Ltd (JBS&G) was engaged by Maryland Development Company Pty Ltd (the client) to provide a letter report for site suitability in relation to proposed rezoning of the north western portion of the Central Precinct Development site, Llandilo, NSW (the site).

It is understood that the client propose to rezone approximately 38 hectares of land currently zoned as employment land in the north-western portion of the site, to residential landuse. In order to determine whether the site is suitable for the proposed rezoning, consideration of contamination issues in accordance with *State Environmental Planning Policy No 55 – Remediation of Land* (SEPP 55) is required. To satisfy this requirement, consideration of contamination investigation reports and, if necessary, suitable remediation planning controls in the form of a remedial action plan are also required.

This letter outlines the contamination reports conducted at the site including various detailed site assessments in previously inaccessible areas and also provides a suitability statement on the site based on the reports conducted.

2. Contamination Investigation Reports

During the mid 1990's various contamination investigation and validation works were conducted throughout the former ADI St Marys Property which ultimately led to the site being made suitable for residential use in a Site Audit Statement (SAS) completed by Christopher Kidd of HLA-Envirosciences 1999¹. However, the SAS excluded the Eastern Sector, QEL, Site 6 and Site 23, buildings, roads and concrete stockpile(s) and the site was subject to implementation of a site contamination management plan including procedures for the safe handling and disposal of any items of ordinance that may be found during earthworks. The SAS is provided in **Attachment 2**.

More recently JBS&G conducted contamination investigation reports in areas not covered by the previous SAS such as in roadways, and in building and stockpile footprints. All assessments were conducted using NEPC 2013 Exposure Setting `A' criteria for residential use with gardens and accessible soils. Contamination investigation reports conducted by JBS&G are listed below.

 Environmental Site Assessment – Priority Road 5, Central Precinct, Llandilo, NSW. JBS&G Australia Pty Ltd (JBS&G 2017a);

¹ Site Audit Statement, ADI St. Marys Property – Excluding Eastern Sector, QEL, Site 6 and Site 23, buildings and Concrete Stockpile, Christopher H Kidd, HLA-Envirosciences Pty Ltd, 1999 (Kidd 1999a)







- EW12 Stockpile Footprint Validation Report Central Precinct, Llandilo, NSW. JBS&G Australia Pty Ltd (JBS&G 2017b);
- EW13 Stockpile Footprint Validation Report Central Precinct, Llandilo, NSW. JBS&G Australia Pty Ltd (JBS&G 2017c);
- Contamination Management Plan (CMP) Central Precinct, Llandilo, NSW. JBS&G Australia Pty Ltd (JBS&G 2015); and
- Specific Remedial Action Plan, Central Precinct Llandilo, NSW. JBS&G Australia Pty Ltd (JBS&G 2017d).

It is noted that the reports prepared were also reviewed and endorsed by the EPA accredited auditor for the site.

- Interim Advice No.4: Review of Contamination Management Plan (CMP) Rev B, Maryland Development Company Pty Ltd, Central Precinct, Llandilo, NSW. Zoic Environmental (Zoic 2015)
- Interim Advice No.45: Review and endorsement of Stockpile Footprint Assessment within EW12, Central Precinct, Llandilo, NSW. Zoic Environmental (Zoic 2017a)
- Interim Advice No.46: Review of Revised Environmental Site Assessment, Priority Road 5
 Central Precinct, Llandilo, NSW. Zoic Environmental (Zoic 2017b)
- Interim Advice No.50: Review and endorsement of Stockpile Footprint Assessment within EW13, Central Precinct, Llandilo, NSW. Zoic Environmental (Zoic 2017c)
- Interim Advice No.53: Review of revised Specific Remedial Action Plan (Rev 4), Central Precinct, Llandilo, NSW. Zoic Environmental (Zoic 2017d)

3. Conclusion

Based on the contamination investigation reports conducted at the site, and subject to the Limitations in **Attachment 1**, it is concluded the site can be made suitable for the proposed residential landuse with gardens and accessible soils consistent with NEPC 2013 Exposure Setting `A', subject to implementation of the Specific Remedial Plan (JBS&G 2017d).

Should you require clarification, please contact the undersigned on 02 8245 0300 or by email gblack@jbsg.com.au.

Yours sincerely:

George Black Environmental Consultant

JBS&G Australia Pty Ltd

Reviewed/Approved by:

Andrew Lau
Principal Contaminated Land
JBS&G Australia Pty Ltd

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Attachments

- 1.) Limitations
- 2.) Previous Site Audit Statement

Attachment 1 – Limitations

This report has been prepared for use by the client who commissioned the works in accordance with the project brief only and has been based in part on information obtained from other parties. The advice herein relates only to this project and all results conclusions and recommendations made should be reviewed by a competent person with experience in environmental investigations, before being used for any other purpose.

JBS&G accepts no liability for use or interpretation by any person or body other than the client. This report should not be reproduced without prior approval by the client, or amended in any way without prior approval by JBS&G, and should not be relied upon by other parties, who should make their own enquires.

Sampling and chemical analysis of environmental media is based on appropriate guidance documents made and approved by the relevant regulatory authorities. Conclusions arising from the review and assessment of environmental data are based on the sampling and analysis considered appropriate based on the regulatory requirements and site history, not on sampling and analysis of all media at all locations for all potential contaminants.

Limited sampling and laboratory analyses were undertaken as part of the investigations, as described herein. Ground conditions between sampling locations may vary, and this should be considered when extrapolating between sampling points. Chemical analytes are based on the information detailed in the site history. Further chemicals or categories of chemicals may exist at the sites, which were not identified in the site history and which may not be expected at the site.

Changes to the subsurface conditions may occur subsequent to the investigations described herein, through natural processes or through the intentional or accidental addition of contaminants. The conclusions and recommendations reached in this report are based on the information obtained at the time of the investigations.

This report does not provide a complete assessment of the environmental status of the site, and it is limited to the scope defined herein. Should information become available regarding conditions at the site including previously unknown sources of contamination, JBS&G reserves the right to review the report in the context of the additional information.

Attachment 2 – Site Audit Statement



NSW Environment Protection Authority SITE AUDIT STATEMENT (SAS)

Site Audit Statement No.: CHK001/1

Site Auditor (accredited under NSW Contaminated Land Management Act 1997):

Name: Christopher H Kidd

Company: HLA-Envirosciences Pty Limited

Address: 55-65 Grandview Street, Pymble, NSW

Postcode: 2076

Phone: (02) 9988 4422

Fax: (02) 9988 4441

Site Details

ADI St. Marys Property - excluding Eastern Sector, QEL, Site 6 and Site 23, buildings and

concrete stockpile.

Address: Forrester Road, St. Marys

Postcode: 2760

Lot and DP Number:

Lot 2 in DP803832

Lot 2 and 3 in DP223888 (part of)

Lot 3 in DP789196 Lot 3 in DP598653

(see attached map for excluded areas)

Local Government Area:

Penrith and Blacktown

Site Audit requested by:

Name: Mr P Newton

Company: Department of Urban Affairs and

Planning

Address:

Sydney Region West Level 8, Signature Tower 2-10 Wentworth Street Parramatta NSW 2150

Phone: (02) 9895 7142 - Fax: (02) 9895 6270

Name of contact person (if different from above:

Consultancy(ies) who conducted the site investigation(s) and/or remediation:

ADI Limited

Chemical and Explosives Ordnance

Investigations, Remediation and Validation 1990 -

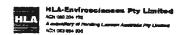
1999

• Mackie Martin & Associates

Groundwater Investigations, 1991

Title(s) of Report(s) reviewed:

- 1. Historical Report St Marys Property, ADI Limited, 1996;
- 2. Validation Report for the Western Sector, ADI St Marys Facility, ADI Limited November 1994;
- 3. Validation Report for the North Western Sector of the ADI St Marys Facility, Report No. 498800, ADI Limited 1995;
- Validation Report for the Southern Sector West of the ADI St Marys Property, Report No. 498810, ADI Limited 1996;



- Validation Report for the Southern Sector East of the St Marys Property, Report No. 498810, ADI Limited 1996;
- 6. Validation Report for the Northern Sector of the ADI St Marys Property, Report No. 498820, ADI Limited 1996;
- 7. Validation Report for the Cental Sector East of the ADI St Marys Property, Report No. 498840, ADI Limited 1997;
- 8. Validation Report for the Central Sector West of the ADI St Marys Property, Report No. 498840, ADI Limited 1996;
- Validation Report for the North Eastern Sector of the ADI St Marys Property, Report No. 498850, ADI Limited 1996;
- QA/Verification Survey Results, ADI St Marys Property, Report No. PG980323da ADI Limited, 1999.

Other Information reviewed:

- Site Investigation Report of St Marys Facility Ammunition and Missiles Division, Volume 4 - Discussions and Conclusions, ADL June 1991.
- 2. Remediation Action Plan for the Northern Sector, ADI St Marys Facility, Report No. 498820, ADI Limited 1996;
- 3. Remediation Action Plan for Central Eastern Sector, ADI St Marys Facility, Report No. 498840, ADI Limited 1996;
- 4. Remediation Action Plan for the Eastern Sector of the ADI St Marys Property, Report No. 498830, ADI Limited 1996;
- 5. Stage I Decontamination Audit, ADI St Marys CMPS&F, 1997.

Summary Site Audit Report Title:

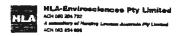
Stage 2 Decontamination Audit Report for ADI Site, St Marys.

I have completed a site audit (as defined in the Contaminated Land Management Act 1997) and reviewed the reports and information referred to above with due regard to relevant laws and guidelines. I certify that the site (tick all appropriate boxes)

(a) is suitable for the following use(s):

- ✓ residential, including substantial vegetable garden and poultry;
- residential, including substantial vegetable garden, excluding poultry;
- accessible soil, including garden (minimal home grown produce sontributing loss than 10% fruit and vegetable intake), excluding poultry;
- ✓ residential with minimal opportunity for soil access including units;
- ✓ daycare centre, preschool, primary school;
- ✓ secondary school;
- ✓ park, recreational open space, playing field;
- ✓ commercial/industrial use;
- Other

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subject to

✓ Conditions

- 1. Excludes Eastern Sector, QEL, Site 6 and Site 23 which are covered by separate site audit statements, namely CHK001/2, CHK001/3, CHK001/4 and CHK001/5.
- Excludes areas not yet investigated including the footprint of original buildings, car
 parks and roads, mainly around former Administration Centre Buildings
 CHK001/6) and the concrete stockpile in Central Sector West. (Stockpile
 CHK001/7)
- 3. An appropriate management plan, including procedures for the safe handling and disposal of any items of ordnance that may be found during earthworks, should be lodged prior to the commencement of development earthworks. This plan should be similar to the "Remnant Contamination Management Plan" submitted by ADI (see Appendix E of the Site Audit Report).

(b) is not suitable for any beneficial use due to risk of harm from contamination	سنتسل
(comments): 124	

I am accredited by the NSW Environment Protection Authority under the Contaminated Land Management Act, 1997 as a site auditor (Accreditation No. 9813).

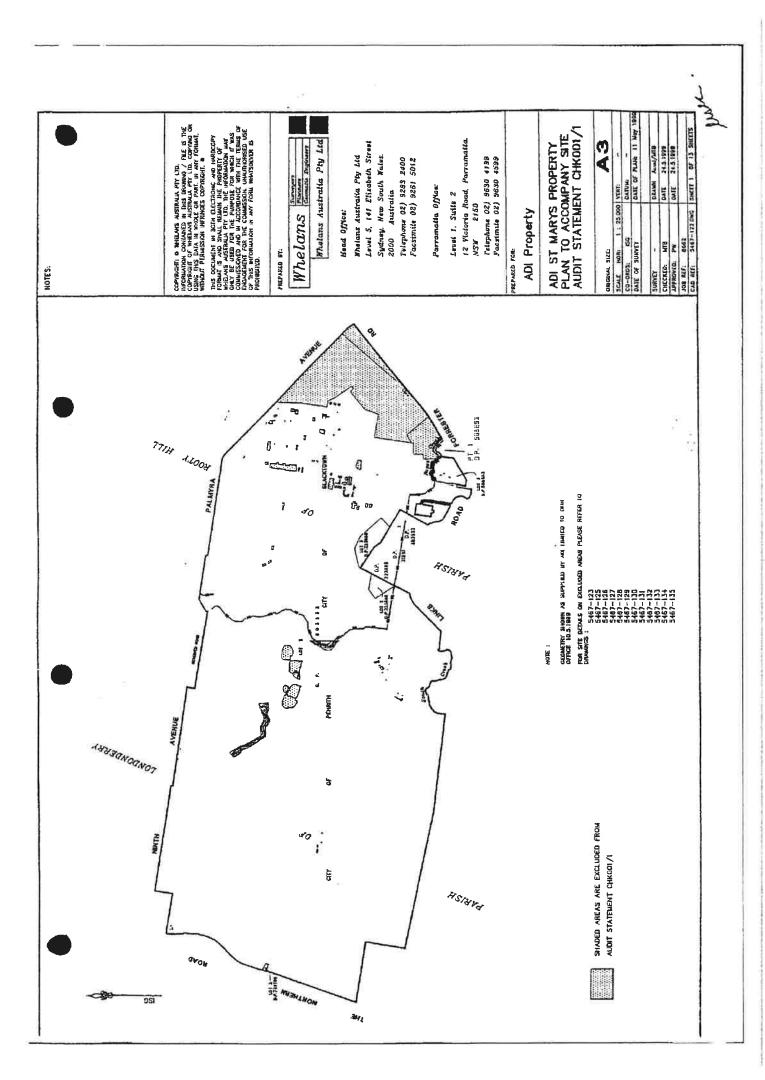
I Certify that:

- (a) I have personally examined and am familiar with the information contained in this statement, including the reports and information referred to in this statement, and
- (b) this statement is to the best of my knowledge, true, accurate and complete, and
- (c) on the basis of my inquiries made to those individuals immediately responsible for making the reports, and obtaining the information, referred to in this statement, those reports and that information are, to the best of my knowledge, true, accurate and complete.

I am aware that there are penalties for wilfully submitting false, inaccurate or incomplete information.

Signed: Signed:

___ Date: ______ 6 | 99





NSW Environment Protection Authority SITE AUDIT STATEMENT (SAS)

Site Audit Statement No.: CHK001/6

Site Auditor (accredited under NSW Contaminated Land Management Act 1997):

Name: Christopher H Kidd Company:

Company: HLA-Envirosciences Pty Limited Postcode: 2076

Address: 55-65 Grandview Street, Pymble, NSW

Phone: (02) 9988 4422

Fax: (02) 9988 4441

Site Details

ADI St. Marys Property - existing buildings and paved areas scattered about the site.

Address: Forrester Road, St. Marys

Postcode: 2760

Lot and DP Number:

Lot 2 in DP803832

Lot 2 and 3 in DP223888 (part of)

Lot 3 in DP598653 (see attached 7 maps)

Local Government Area:

Penrith and Blacktown

Site Audit requested by:

Name: Mr P Newton

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Address:

Sydney Region West Level 8, Signature Tower 2-10 Wentworth Street

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- Validation Report for the North Western Sector of the ADI St Marys Facility, Report No. 498800, ADI Limited 1995;
- Validation Report for the Southern Sector West of the ADI St Marys Property, Report No. 498810, ADI Limited 1996;



- 15. Validation Report for the Southern Sector East of the St Marys Property, Report No. 498810, ADI Limited 1996;
- Validation Report for the Northern Sector of the ADI St Marys Property, Report No. 498820, ADI Limited 1996;
- 17. Validation Report for the Cental Sector East of the ADI St Marys Property, Report No. 498840, ADI Limited 1997;
- 18. Validation Report for the Central Sector West of the ADI St Marys Property, Report No. 498840, ADI Limited 1996;
- Validation Report for the North Eastern Sector of the ADI St Marys Property, Report No. 498850, ADI Limited 1996;
- QA/Verification Survey Results, ADI St Marys Property, Report No. PG980323da ADI Limited, 1999.

Other Information reviewed:

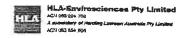
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- 10. Stage I Decontamination Audit, ADI St Marys CMPS&F, 1997.

Summary Site Audit Report Title:

Stage 2 Decontamination Audit Report for ADI Site, St Marys.

I have completed a site audit (as defined in the Contaminated Land Management Act 1997) and reviewed the reports and information referred to above with due regard to relevant laws and guidelines. I certify that the site (tick all appropriate boxes)

(a)	is suit	able for the following use(s):
	=	residential, including substantial vegetable garden and poultry; كالعالم
	Q -	residential, including substantial vegetable garden, excluding poultry, 244
	Q-	residential with accessible soil, including garden (minimal home grown produce Lake
		contributing less than 10% fruit and vegetable intake), excluding poultry; uux
	0	residential with minimal opportunity for soil-access including units;
		dayoare centre, preschool, primary school;
		secondary school: 244
	-	-park, recreational open space, playing field; Juke
	1	commercial/industrial use;
	1	Other – May continue to be used for existing commercial use and carparks, but underlying soils need to be tested for chemical and ordnance contamination after
		demolition,



subject to

✓ Conditions

- Soils under existing buildings, car parks, roads and the concrete stockpile shall be tested for ordnance and/or chemical contamination when these facilities are removed; site audits statements for these areas will also be required.
- 2. An appropriate management plan, including procedures for the safe handling and disposal of any items of ordnance that may be found during earthworks, should be lodged prior to the commencement of development earthworks. This plan should be similar to the "Remnant Contamination Management Plan" submitted by ADI (see Appendix E of the Site Audit Report).

(b) is not suitable for any beneficial use due to risk of harm from contamination	were
□ (comments)	/
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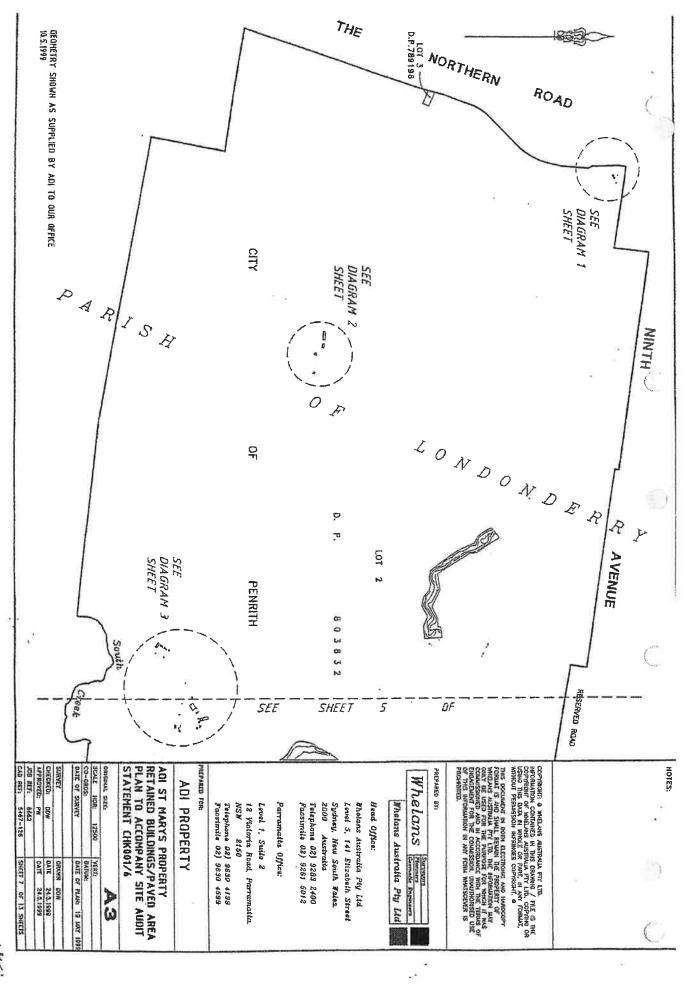
I am accredited by the NSW Environment Protection Authority under the Contaminated Land Management Act, 1997 as a Site Auditor (Accreditation No. 9813).

I Certify that:

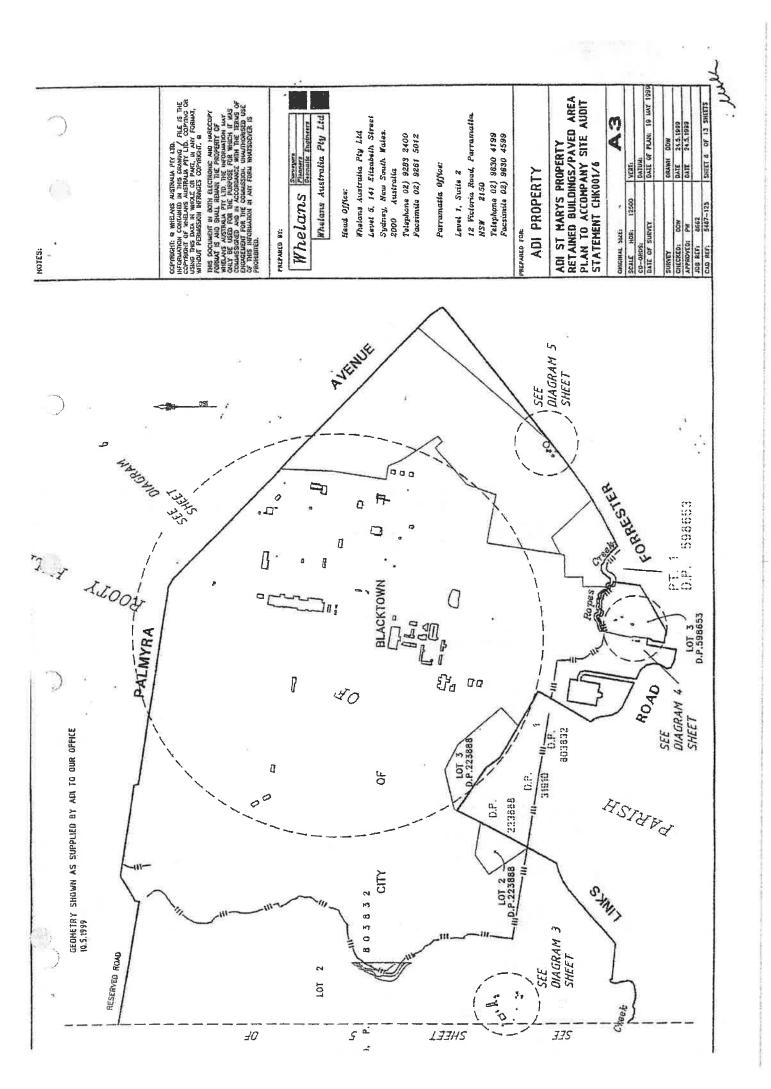
- (a) I have personally examined and am familiar with the information contained in this statement, including the reports and information referred to in this statement, and
- (b) this statement is to the best of my knowledge, true, accurate and complete, and
- (c) on the basis of my inquiries made to those individuals immediately responsible for making the reports, and obtaining the information, referred to in this statement, those reports and that information are, to the best of my knowledge, true, accurate and complete.

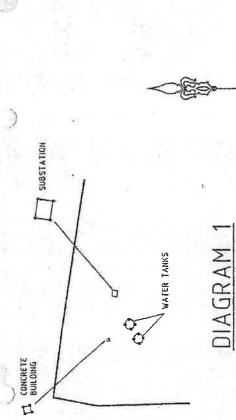
I am aware that there are penalties for wilfully submitting false, inaccurate or incomplete information.

Signed: Date: $\frac{7}{6}/9$



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Sydney, New South Wales. PREPARED BY:

Whelans Australia Pty Ltd Whelans Person

Hand Office:

Pholony Australia Phy Lid Lavel 5, 141 Elizabeth Street

Telephone 02) 9283 2400 Facsimile 02) 9251 5012 2000 Australia

Parramatta Office:

12 Viotoria Road, Porranalla. NSW 2150 Telephone 02) 9630 4199 Facsimile 02) 9630 4599 Level 1, Suite 2

ADI PROPERTY

ADI ST MARYS PROPERTY RETAINED BUILDINGS/PAVED AREA PLAN TO ACCOMPANY SITE AUDIT STATEMENT CHK001/6

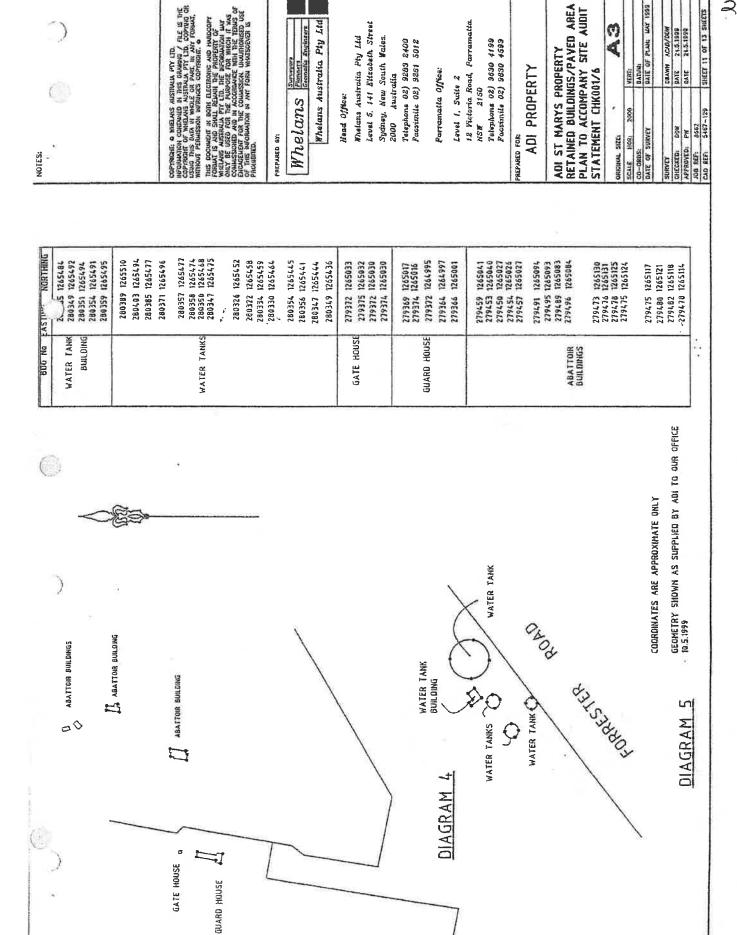
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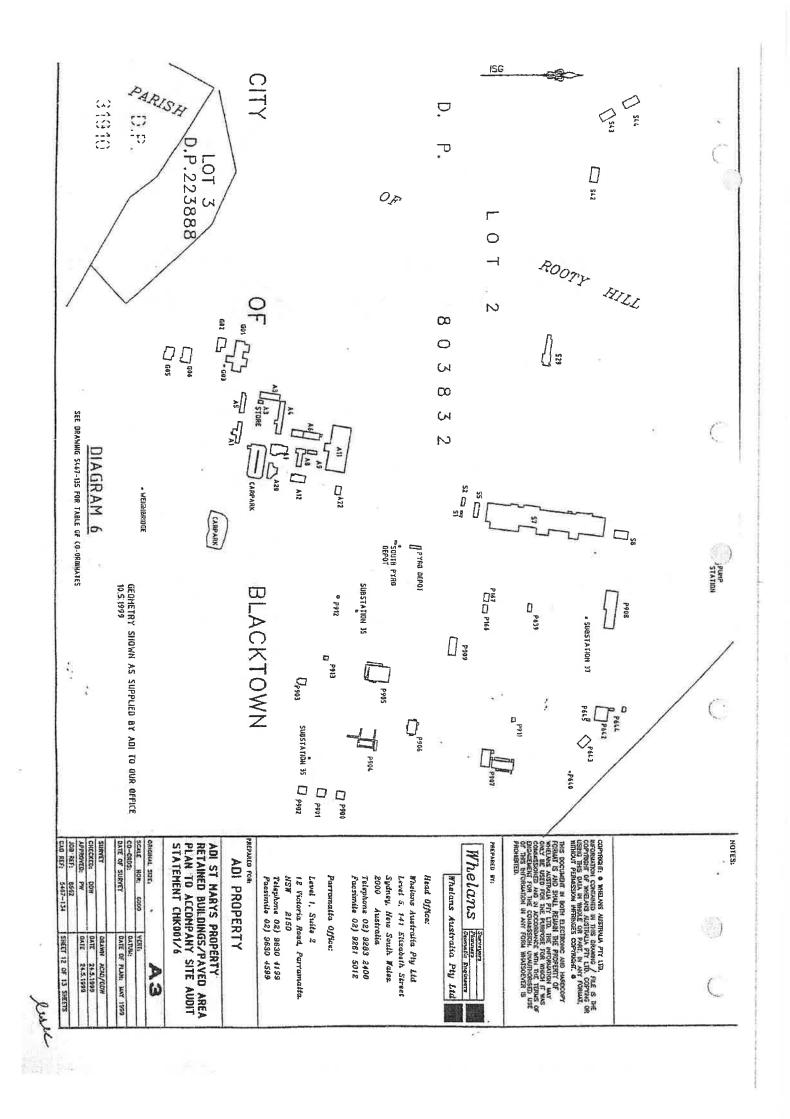
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NSW Environment Protection Authority

SITE AUDIT STATEMENT (SAS)

Site Audit Statement No.: CHK001/7

Site auditor (accredited under NSW Contaminated Land Management Act 1997):

Name: Christopher H Kidd

Company: HLA-Envirosciences Pty Limited

Address: 55-65 Grandview Street, Pymble, NSW

Postcode: 2076

Phone: (02) 9988 4422

Fax: (02) 9988 4441

Site Details

ADI St. Marys Property - Concrete Stockpile

Address: Forrester Road, St. Marys

Postcode: 2760

Lot and DP Number:

Lot 2 in DP803832 (part of)

(see attached map)

Local Government Area:

Penrith and Blacktown

Site Audit requested by:

Name: Mr P Newton

Company: Department of Urban Affairs and

Planning

Address:

Sydney Region West Level 8, Signature Tower 2-10 Wentworth Street Parramatta NSW 2150

Phone: (02) 9895 7142 - Fax: (02) 9895 6270

Name of contact person (if different from above:

Consultancy(ies) who conducted the site investigation(s) and/or remediation:

ADI Limited

Chemical and Explosives Ordnance

Investigations, Remediation and Validation 1990-

1999

Mackie Martin & Associates

Groundwater Investigations, 1991

Title(s) of Report(s) reviewed:

- 4. Historical Report St Marys Property, ADI Limited, 1996;
- Validation Report for the Central Sector West of the ADI St Marys Property, Report No. 498840, ADI Limited 1996;
- QA/Verification Survey Results, ADI St Marys Property, Report No. PG980323da ADI Limited, 1999.



Other Information reviewed:

- Site Investigation Report of St Marys Facility Ammunition and Missiles Division, Volume 4 - Discussions and Conclusions, ADI, June 1991.
- Stage I Decontamination Audit, ADI St Marys CMPS&F, 1997.

Summary Site Audit Report Title:

Stage 2 Decontamination Audit Report for ADI Site, St Marys.

I have completed a site audit (as defined in the Contaminated Land Management Act 1997) and reviewed the reports and information referred to above with due regard to relevant laws and guidelines. I certify that the site (tick all appropriate boxes)

15	suitable for the following use(s):
4	residential, including substantial vegetable garden and poultry;
-	-residential, including substantial vegetable garden, excluding poultry;
-	residential with accessible soil, including garden (minimal home grown produce
	contributing less than 10% fruit and vegetable intake), excluding poultry;
-	residential with minimal opportunity for soil access including units:
	dayeare centre, preschool, primary school;
-	-secondary school;
<u></u>	park, recreational open space, playing field;
	-commercial/industrial use:
✓	Other – May continue to be used as stockpile for crushed concrete, but underlying soils need to be tested for chemical and ordnance contamination after stockpile removed.

subject to

- Conditions
- 1. On removal of all or part of the stockpile the underlying ground should be tested for both chemical and ordnance contamination. The testing should follow similar methods and levels of quality assurance as other parts of the ADI St Marys site. Appropriate remediation and validation should be performed (if necessary) the work reviewed by a site auitor.
- 3. Appropriate management plan including procedures for the safe handling and disposal of any items of explosive ordnance, shall be in place before development earthworks commences and shall remain in place to cover any excavation on the site during its ongoing use. This plan should be similar to the "Remnant Contamination Management Plan" submitted by ADI (see Appendix E of the Site Audit Report).
- 4. The final surface of any earthworks in areas which are to be used for active recreational land uses, e.g. sports grounds, school grounds and picnic areas, or low

density residential use, should, on completion of the earthworks, be surveyed with
a metal detector by appropriately qualified and experienced personnel and the wor
reviewed by an independent site auditor.
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suitable for any beneficial use due to risk of harm from contamination
A MINISTER OF THE STREET AND A
(comments):



I am accredited by the NSW Environment Protection Authority under the Contaminated Land Management Act, 1997 as a Site Auditor (Accreditation No. 9813).

I Certify that:

- (g) I have personally examined and am familiar with the information contained in this statement, including the reports and information referred to in this statement, and
- (h) this statement is to the best of my knowledge, true, accurate and complete, and
- (i) on the basis of my inquiries made to those individuals immediately responsible for making the reports, and obtaining the information, referred to in this statement, those reports and that information are, to the best of my knowledge, true, accurate and complete.

I am aware that there are penalties for wilfully submitting false, inaccurate or incomplete information.

Signed:

